## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MASON EUGENE BREINER- : CHAPTER 13

**MYERS** 

Debtor(s)

:

JACK N. ZAHAROPOULOS

STANDING CHAPTER 13 TRUSTEE

Movant

•

•

MASON EUGENE BREINER-

**MYERS** 

VS.

Respondent(s) : CASE NO. 1-20-bk-02760

## TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, this 22nd day of March, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. Debtor(s)' plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required.
- 2. Trustee avers that debtor(s)' plan cannot be administered due to the lack of the following:
  - a. Last paystub dated March, 2022.
  - b. Unfiled 2018 federal income tax returns (Claim #1-2).
  - 3. The Trustee avers that debtor's plan is not feasible based upon the following:
    - a. Insufficient Monthly Net Income as indicated on Schedules I and J. (Monthly Net Income is \$1,034.13.)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: <u>/s/James K. Jones</u> Attorney for Trustee

## CERTIFICATE OF SERVICE

AND NOW, this 22nd day of March, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Paul Murphy-Ahles, Esquire 2132 Market Street Camp Hill, PA 17011

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee